

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

RASHEED CARRASQUILLO, on behalf of  
himself and all others similarly situated,

Plaintiffs,

v.

SECURITAS SECURITY SERVICES USA,  
INC.,

Defendant.

Civil Action No. 1:24-cv-1008

**JOINT MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT AND  
DISMISSAL WITH PREJUDICE**

Plaintiff Rasheed Carasquillo (“Plaintiff”) and Defendant Securitas Security Services USA, Inc. (“Defendant”) (collectively, the “Parties”), hereby jointly and respectfully move the Court for approval of the Parties’ proposed settlement of the above-captioned action, the terms of which are set forth in the Settlement and Release Agreement (“Settlement Agreement”), attached as Exhibit A to the accompanying Memorandum of Law, and to dismiss the action in its entirety with prejudice, which includes Plaintiff’s claims under the Fair Labor Standards Act (“FLSA”) and the North Carolina Wage and Hour Act (“NCWHA”). For the reasons stated in the Memorandum of Law, the settlement of this action is a fair and reasonable resolution of a *bona fide* FLSA dispute.

**WHEREFORE**, the Parties hereby request that the Court grant this Motion and enter the proposed Order approving the Settlement and Release Agreement and dismissing the above-captioned action in its entirety with prejudice.

Respectfully submitted this April 22, 2025.

/s/ Gilda Adriana Hernandez

Gilda A. Hernandez (NCSB No. 36812)  
Hannah B. Simmons (NCSB No. 59579)  
Matthew Marlowe (NCSB No. 60035)  
Briahna B. Koegel (NCSB No. 62491)  
**THE LAW OFFICES OF GILDA A.  
HERNANDEZ, PLLC**  
1020 Southhill Drive, Suite 130  
Cary, NC 27513  
Tel: (919) 741-8693  
Fax: (919) 869-1853  
ghernandez@gildahernandezlaw.com  
hsimmons@gildahernandezlaw.com  
mmarlowe@gildahernandezlaw.com  
bkoegel@gildahernandezlaw.com

*Attorneys for Plaintiff*

/s/ Andrea M. Kirshenbaum

Andrea M. Kirshenbaum (*Special Appearance*)  
Jennifer Nix Capozzola (*Special Appearance*)  
**LITTLER MENDELSON, P.C.**  
Three Parkway  
1601 Cherry St., Suite 1400  
Philadelphia, PA 19102-1321  
Telephone: 267.402.3000  
Facsimile: 267.402.3131  
akirshenbaum@littler.com  
jcapozzola@littler.com

/s/ Stephen D. Dellinger

Stephen D. Dellinger (NCSB No. 16609)  
**LITTLER MENDELSON, P.C.**  
100 North Tryon St., Suite 4150  
Charlotte, North Carolina 28202  
Telephone: 704.972.7000  
Facsimile: 704.333.4005  
sdellinger@littler.com

*Attorneys for Defendant*

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 22, 2025, I electronically filed the foregoing Joint Motion to Approve Settlement Agreement and Dismiss with Prejudice with accompanying Memorandum of Law, Exhibits, and Proposed Order with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants:

Gilda A. Hernandez (NCSB No. 36812)  
Hannah B. Simmons (NCSB No. 59579)  
Matthew S. Marlowe (NCSB No. 60035)  
Briahna B. Koegel (NCSB No. 62491)

**THE LAW OFFICES OF GILDA A. HERNANDEZ, PLLC**

1020 Southhill Drive, Ste. 130  
Cary, NC 27513

ghernandez@gildahernandezlaw.com  
hsimmons@gildahernandezlaw.com  
mmarlowe@gildahernandezlaw.com  
bkoegel@gildahernandezlaw.com

*Attorneys for Plaintiff*

Respectfully submitted,

/s/ Stephen D. Dellinger

Stephen D. Dellinger

N.C. State Bar No. 16609

**LITTLER MENDELSON, P.C.**

100 N. Tryon Street, Suite 4150

Charlotte, NC 28202

Telephone: 704.972.7000

Facsimile: 704.333.4005

sdellinger@littler.com

/s/ Andrea M. Kirshenbaum

Andrea M. Kirshenbaum

*(Special Appearance)*

Jennifer Nix Capozzola

*(Special Appearance)*

**LITTLER MENDELSON, P.C.**

Three Parkway

1601 Cherry Street, Suite 1400

Philadelphia, PA 19102.1321

Telephone: 267.402.3000

Facsimile: 267.402.3131

akirshenbaum@littler.com

jcapozzola@littler.com

*Attorneys for Defendant*

*Securitas Security Services USA, Inc.*